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December 13, 2023

The Honorable John P. Cronan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

*Re: Jose Mario Perez v. HKAL 34th Street LP and Addolorata Inc.; 1:22-cv-09337(JPC)(KHP)*

Dear Judge Cronan:

We represent plaintiff Jose Mario Perez in the above-entitled action. On behalf of the plaintiff and with the consent of the defendants we write to respectfully ask the Court to extend the time for the parties to file the stipulation of dismissal by thirty (30) days, from December 13, 2023 to January 12, 2024, or, in the alternative, for the Court to re-open the case.<sup>1</sup> The reason for this request is that the parties require additional time to finalize and execute the settlement agreement.

By way of background, the parties settled this action on November 13, 2023 and have been memorializing their settlement terms in a settlement agreement. On November 20, 2023 defendants circulated a draft settlement agreement and on December 1, 2023 plaintiff provided his comments to the agreement. On December 11, 2023 plaintiff received a revised draft of the settlement agreement containing all of defendants comments to plaintiff's revised draft. Plaintiff is currently reviewing the revised agreement.

As a result of the above, plaintiff respectfully seeks an extension of time, until January 12, 2024, to enable the parties to finalize and execute the settlement agreement.

Thank you for your time and attention to this matter.

Given that the parties require additional time to finalize and execute their settlement agreement, the deadline for the parties to restore this action is extended until January 12, 2024. See Dkt. 41.

Respectfully yours,

/s/

Robert G. Hanski, Esq.



JOHN P. CRONAN  
United States District Judge

SO ORDERED.  
Date: December 18, 2023  
New York, New York

<sup>1</sup> This is the first request for an extension of time.